

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

LA MICHOACANA NATURAL, LLC  
a North Carolina limited liability company,

Plaintiff,

vs.

Civil Action No. 3:17cv727

LUIS MAESTRE, an individual, d/b/a  
LA MICHOACANA and/or LA LINDA  
MICHOACANA; ADRIANA TERAN,  
an individual, d/b/a LA MICHOACANA  
and/or LA LINDA MICHOACANA; and  
LA MICHOACANA, a business entity,  
form unknown.

Defendants.

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**Declaration of Stephen L. Anderson in Support of Plaintiff's  
Opposition to Defendants' Motion to Dismiss**

I, Stephen L. Anderson, Esq., hereby declare and state the following:

1. I am lead for Plaintiff La Michoacana Natural, LLC in the above captioned matter.
2. On and between February 28, 2018 and March 2, 2018, I conducted online research regarding the identity of ADRIANA TERAN, LUIS MAESTRE and LA LINDA MICHOACANA aka LA MICHOACANA or 280 Concord Parkway, S. Concord, NC.

3. For example, I went to the social media website Facebook and I determined that the ADRIANA TERAN whose profile pictures and posts are collectively attached hereto as Exhibit 3 was the same named Defendant in this case. Notably, several photographs taken from her web page display the infringing ice cream business at issue herein.

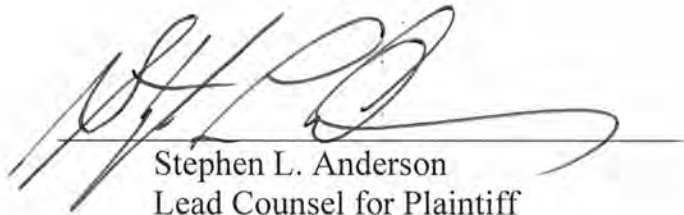
4. Further research included several public records searches which I personally performed on such dates. As is shown by the report attached as Exhibit 4, Defendant ADRIANA TERAN is a resident of North Carolina who has no marriage records. Further searches of LUIS MAESTRE and other related names including Luis R. and Luis A Maestre resulted in additional information and reports attached hereto which also show no marriage records, but indicates that Luis Maestre is also a resident of North Carolina. Additional information relative to Mr. Maestre, including several photographs and posts which show that he has several aliases and that he is also operating another business called MOCHICA Peruvian Chicken in the same shopping center occupied by the infringing business are collectively attached hereto as Exhibit 5.

5. Additional research that I performed on such dates also revealed that LUIS MAESTRE and ADRIANA TERAN are identified as the owners of the infringing business on several webpages and on a downloadable software application currently available online internationally from the Google Play store in at least 5 separate languages. True copies of such screenshots and printouts are collectively attached as Exhibit 6 hereto.

6. Since February 15, 2018, I have been in contact with an attorney for Defendants who has identified himself as Christopher Peace. During our initial discussion, Mr. Peace advised me that he had reviewed the Summons and Complaint in this matter and that he would be representing Defendants herein.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that all the foregoing is true and correct.

March 2, 2018



Stephen L. Anderson  
Lead Counsel for Plaintiff  
La Michoacana Natural, LLC